

Timothy M. Bechtold  
Bechtold Law Firm, PLLC  
P.O. Box 7051  
Missoula, MT 59807  
(406) 721-1435  
tim@bechtoldlaw.net  
Attorney for Northern Plains Plaintiffs  
(additional counsel listed on signature pages)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
GREAT FALLS DIVISION**

INDIGENOUS ENVIRONMENTAL  
NETWORK and NORTH COAST  
RIVER ALLIANCE,

and

NORTHERN PLAINS RESOURCE  
COUNCIL, et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT  
OF STATE, et al.,

Defendants,

TRANSCANADA KEYSTONE  
PIPELINE and TRANSCANADA  
CORPORATION,

Defendant-Intervenors.

CV 17-29-GF-BMM

CV 17-31-GF-BMM

**Northern Plains Plaintiffs'  
Notice of Cross-Appeal**

Notice is hereby given that Plaintiffs Northern Plains Resource Council, Bold Alliance, Center for Biological Diversity, Friends of the Earth, Natural Resources Defense Council, Inc., and Sierra Club cross-appeal to the United States Court of Appeals for the Ninth Circuit this Court's November 8, 2018 Order on summary judgment motions filed by the parties (ECF No. 211), and November 15, 2018 Judgment in a Civil Case (ECF No. 213).

Defendant-Intervenors TransCanada Keystone Pipeline, LP and TransCanada Corporation filed a notice of appeal in this matter on December 21, 2018 (ECF No. 233), Appeals Docket No. 18-36069.

This notice is filed within 60 days of this Court's December 7, 2018 Order on Defendant-Intervenors' motion to amend (ECF No. 232), and is therefore timely pursuant to Federal Rule of Appellate Procedure 4(a)(1)(B), (a)(3)-(4)(A).

A Representation Statement is attached hereto pursuant to Ninth Circuit Rules 3-2(b) and 12-2.

Respectfully submitted,

Dated: January 28, 2019

/s/ Doug Hayes

Doug Hayes (*pro hac vice*)

/s/ Eric Huber

Eric Huber (*pro hac vice*)

Sierra Club Environmental Law Program

1650 38th Street, Suite 102W

Boulder, CO 80301

(303) 449-5595

doug.hayes@sierraclub.org

eric.huber@sierraclub.org

*Attorneys for Sierra Club and Northern  
Plains Resource Council*

/s/ Jaclyn Prange

Jaclyn Prange (*pro hac vice*)

/s/ Cecilia Segal

Cecilia Segal (*pro hac vice*)

Natural Resources Defense Council

111 Sutter Street, Floor 21

San Francisco, CA 94104

(415) 875-6100

jprange@nrdc.org

csegal@nrdc.org

*Attorneys for Bold Alliance and Natural  
Resources Defense Council*

/s/ Jared Margolis

Jared Margolis (*pro hac vice*)

/s/ Amy Atwood

Amy R. Atwood (*pro hac vice*)

Center for Biological Diversity

P.O. Box 11374

Portland, OR 97211

(971) 717-6401

jmargolis@biologicaldiversity.org

atwood@biologicaldiversity.org

*Attorneys for Center for Biological Diversity  
and Friends of the Earth*

/s/ Timothy M. Bechtold

Timothy M. Bechtold

Bechtold Law Firm, PLLC

P.O. Box 7051

Missoula, MT 59807

(406) 721-1435

tim@bechtoldlaw.net

*Attorney for all Plaintiffs*

**CERTIFICATE OF SERVICE**

I certify that I served the foregoing document on all counsel of record via the Court's CM/ECF system.

/s/ Cecilia Segal